

Exhibit 1

Civil Investigative Demand
For Oral Testimony

United States Department of Justice
United States Attorney's Office - Newark, NJ

To: Roderick Jefferson [REDACTED]	Civil Investigative Demand No. NJ-2024-113
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This Civil Investigative Demand is issued pursuant to the False Claims Act, 31 U.S.C. §§ 3729-3733, in the course of a False Claims Act investigation to determine whether there is or has been a violation of 31 U.S.C. § 3729. The False Claims Act investigation focuses on whether the [REDACTED] or anyone acting on [REDACTED] behalf, violated the False Claims Act by making false statements, or causing false statements to be made, in order to obtain loans pursuant to Paycheck Protection Program, enacted pursuant to the CARES Act, Pub. L. No. 116-136 (March 27, 2020).

This Demand requires you to provide oral testimony under oath, commencing thirty (30) days from the date of receipt of this Demand, at 10:00 am at the U.S. Attorney's Office for the District of New Jersey, 970 Broad Street, Suite 700, Newark, NJ 07102, or at such time and location as may be agreed upon by Assistant U.S. Attorney David V. Simunovich and you. The testimony will be taken stenographically and also may be recorded audio-visually.

Assistant U.S. Attorney David V. Simunovich has been designated as the false claims law investigator in this matter and will attend the examination. Mr. Simunovich will conduct the examination and is the custodian to whom the transcript of the examination will be delivered.

Your attendance and testimony at the oral examination are necessary to the conduct of the False Claims Act investigation described above. You have the right to be accompanied by an attorney and any other personal representative at the oral examination. The general purpose and primary area of focus for which your testimony is sought concerns (i) your knowledge of [REDACTED] applications for, and receipt of PPP loans; (ii) what steps you took to ensure the truthfulness of the information in the [REDACTED] PPP applications, including with respect to [REDACTED] eligibility; and (iii) how the PPP loan proceeds were used.

Issued at Newark, New Jersey.

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Date: 2024.12.09
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Bernard Cooney
Chief, Health Care Fraud Unit
United States Attorney's Office
District of New Jersey